

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Superior-Essex

Chemical Processing Plant
1700 West Swinney
Fort Wayne, Indiana 46802

and

Wire Coating Plant
1601 Wall Street
Fort Wayne, Indiana 46802

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|----------------|
| Operation Permit No.: T003-7654-00269 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: |

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Chemical Processing Plant - Reactor & Kettles

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC)
- D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

D.2 FACILITY OPERATION CONDITIONS - Chemical Processing Plant - Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]
- D.2.2 Sulfur Dioxide [326 IAC 12-1]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.6 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.7 Record Keeping Requirements
- D.2.8 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Chemical Processing Plant - storage tanks

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 40 CFR Part 60, Subpart Kb

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS - Wire Coating Plant - Oven 52

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds [326 IAC 8-2-8]

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds

D.4.4 Volatile Organic Compounds

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

D.5 FACILITY CONDITIONS - Wire Coating Plant - Ovens 53-63

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC)

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

D.6 FACILITY OPERATION CONDITIONS - Wire Coating Plant- Ovens 65 and 66

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds [326 IAC 8-2-8]

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds

D.6.4 Volatile Organic Compounds

D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.7 Record Keeping Requirements

D.7 FACILITY OPERATION CONDITIONS - Wire Coating Plant- Ovens 24, 25 and 26

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds

Compliance Determination Requirements

D.7.2 Volatile Organic Compounds

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Record Keeping Requirements

D.8 FACILITY OPERATION CONDITIONS - Wire Coating Plant- Ovens 35, 36 and 37

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compounds

Compliance Determination Requirements

D.8.2 Volatile Organic Compounds

D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.4 Record Keeping Requirements

D.9 FACILITY OPERATION CONDITIONS - Degreasing operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Volatile Organic Compounds [326 IAC 8-3-2]

Compliance Determination Requirements

D.9.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Certification

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Semi-Annual Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a wire coating operation.

| | |
|-----------------------|--|
| Responsible Official: | Chemical Plant: Chemical Processing Plant Superintendent Magnet Wire Plant: Magnet Wire Plant Manager |
| Source Address: | Chemical Processing Plant: 1700 West Swinney, Fort Wayne, Indiana 46802 Wire Coating Plant: 1601 Wall Street, Fort Wayne, Indiana 46802 |
| Mailing Address: | Chemical Processing Plant: 1700 West Swinney, Fort Wayne, Indiana 46802 Wire Coating Plant: 1601 Wall Street, Fort Wayne, Indiana 46802 |
| Phone Number: | For both plants: 219-461-4270 |
| SIC Code: | 2851 and 3357 |
| County Location: | Allen |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program Major under PSD Major Source, Section 112 of the Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Chemical Processing Plant:

- (a) Two (2) 4000 gallon hot oil heated reactors with fume scrubbers, agitator condenser and distillation column identified as emission units R-1 and R-2.
- (b) Seven (7) jacketed mix kettles identified as follows:
 - (1) Two (2) 2000 gallon jacketed mix kettles equipped with agitator and condenser, identified as emission units K-1 and K-2.
 - (2) One (1) 1000 gallon jacketed mix kettle equipped with agitator and condenser, identified as K-3.
 - (3) One (1) 4000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-4.
 - (4) One (1) 5000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-5.
 - (5) Two (2) 10,000 gallon jacketed kettles, each equipped with an agitator and a condenser, identified as emission units K-6 and K-7.
- (c) Two 16.74 MMBtu per hour boilers, identified as follows:

- (1) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit EB and exhausting to stack ID SCB. This boiler is equipped with a burner to use No. 2 fuel oil in case of an emergency to prevent a total shutdown.
- (2) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit WB and exhausting to stack ID SCB.

Wire Coating Plant

- (a) One (1) wire enameling oven with an integral internal thermal oxidizer, identified as emission unit number 52, with a maximum capacity of 531 pounds of copper wire per hour. Emissions shall be exhausted at stack S52.
- (b) The following eleven (11) wire enameling ovens with add on thermal incinerators for control:
 - (1) Five (5) wire enameling ovens with add on thermal incinerators for control, identified as emission units 53, 54, 55, 56 and 57, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the west incinerator identified as SWI.
 - (2) Three (3) wire enameling ovens with add on thermal incinerators for control, identified as emission units 58, 59 and 60, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
 - (3) Two (2) wire enameling ovens with add on thermal incinerators for control, identified as emission units 61 and 62, with a maximum capacity of 156.49 pounds of aluminum wire per hour each or a maximum capacity of 398.75 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
 - (4) One (1) wire enameling oven with add on thermal incinerator for control, identified as emission unit 63, with a maximum capacity of 144.72 pounds of copper wire per hour or a maximum capacity of 127.14 pounds of aluminum wire per hour. Emissions shall be exhausted at the east incinerator identified as SEI.
- (c) Two (2) wire enameling ovens with an integral internal thermal oxidizer, identified as emission units 65 and 66, with a maximum capacity of 891 pounds of copper/aluminum wire per hour each. Emissions shall be exhausted at stacks S65 and S66, respectively.
- (d) Three (3) wire coating ovens, identified as emission units 24, 25 and 26, with a maximum capacity of 272 pounds per hour each. Emissions shall be exhausted at stack SF-1.
- (e) Three (3) wire coating ovens, identified as emission units 35, 36 and 37, with a maximum capacity of 172.39 pounds per hour each. Emissions shall be exhausted at stack SF-2.

[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Chemical Plant

- (a) The following storage tanks emitting less than 15 pounds per day of VOC:
 - (1) outside storage tanks 1 through 8 and 10 through 24
 - (2) inside storage tanks 25 through 30

Wire Coating Plant

- (a) Degreasing operation with a maximum usage of 2533 pounds per year of hydrocarbon.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information

that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-5(3)(C)] [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
 - (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information refers to information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating

scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
-
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the

Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the

Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the

case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be

an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for

purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission

required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Chemical Processing Plant

Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) 4000 gallon hot oil heated reactors with fume scrubbers, agitator condenser and distillation column identified as emission units R-1 and R-2.
- (b) Seven (7)) jacketed mix kettles identified as follows:
 - (1) Two (2) 2000 gallon jacketed mix kettles equipped with agitator and condenser, identified as emission units K-1 and K-2.
 - (2) One (1) 1000 gallon jacketed mix kettle equipped with agitator and condenser, identified as K-3.
 - (3) One (1) 4000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-4.
 - (4) One (1) 5000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-5.
 - (5) Two (2) 10,000 gallon jacketed kettles, each equipped with an agitator and a condenser, identified as emission units K-6 and K-7.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds

Any change or modification which may increase VOC potential emissions above 25 tons per year, from the two (2) 4000 gallon hot oil heated reactors, identified as emission units R-1, R-2, or the seven (7) jacketed mix kettles identified as K-1, K-2, K-3, K-4, K-5, K-6, and K-7 shall require prior approval from the OAM to determine applicability requirements, before such change may occur.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2

FACILITY OPERATION CONDITIONS

Chemical Processing Plant

Facility Description [326 IAC 2-7-5(15)]

Two (2) 16.74 MMBtu per hour boilers, identified as follows:

- (1) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit EB and exhausting to stack ID SCB. This boiler is equipped with a burner to use No. 2 fuel oil in case of an emergency to prevent total shutdown.
- (2) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit WB and exhausting to stack ID SCB.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating), particulate emissions from the one (1) 16.74 MMBtu per hour natural gas fired boiler and the one (1) 16.74 MMBtu per hour natural gas fired boiler with No. 2 fuel oil backup, shall be limited to 0.437 pounds PM per MMBtu heat input each based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = pounds of particulate matter emitted per MMBtu heat input.

Q = Total source maximum operating capacity rating in MMBtu per hour.

D.2.2 Sulfur Dioxide [326 IAC 12-1]

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units):

- (a) The SO₂ emissions from the 16.74 MMBtu per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per MMBtu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight.

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when fuel oil is being burned and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60, Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown and malfunction.
 - (1) Calendar dates covered in the compliance determination period;

- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust when burning fuel oil.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit - or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Chemical Processing Plant

Facility Description [326 IAC 2-7-5(15)]

The following storage tanks emitting less than 15 pounds per day of VOC:

- (1) outside storage tanks 1 through 8 and 10 through 24
- (2) inside storage tanks 25 through 30

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels)

- (a) Storage tanks 17 through 23 are subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of each tank is greater than 40 m³ that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.
- (b) The tanks are exempt from the General Provisions (Part 60, subpart A) and from the provisions of this subpart because the tanks have a capacity less than or equal to 75 m³, storing liquid.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

To document compliance with Condition D.3.1, the Permittee shall keep readily accessible records showing the dimension of the storage tanks and an analysis showing the capacity of the storage tanks.

SECTION D.4

FACILITY OPERATION CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

One (1) wire enameling oven with an integral internal thermal oxidizer, identified as emission unit number 52, with a maximum capacity of 531 pounds per hour. Emissions shall be exhausted at stack S52.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), the volatile organic compound (VOC) content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall be limited to 1.7 pounds VOC per gallon of coating less water delivered to the applicator.
- (b) The limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.3 Volatile Organic Compounds (VOC)

- (a) The integral internal thermal oxidizer associated with oven 52 shall operate with an overall efficiency of not less than 95.19% at all times when the wire enameling oven is in operation.
- (b) The 95.19% overall efficiency is necessary to ensure compliance with 326 IAC 8-2-8.
- (c) The integral internal thermal oxidizer shall be operated at or above 1380EF or a temperature determined during compliance tests to maintain a minimum 95.19% overall efficiency.
- (d) The worst case coating VOC content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall not exceed 6.46 pounds VOC per gallon of coating less water. This is equivalent to a VOC content of 1.7 pounds VOC per gallon of coating less water after the effect of the integral internal thermal oxidizer.

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (b) Additionally, if a higher VOC content coating is used or if the temperature falls below the 1380EF required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner to ensure compliance with the 95.19% overall efficiency.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

- (a) Compliance with the 1380EF minimum temperature will be monitored by computer collected data generated continuously.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature.
- (e) If during specific hours the temperature is less than the established minimum temperature, this will be considered noncompliance.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition 4.1, the Permittee shall maintain records of material safety data sheets (MSDS) to verify the VOC content of each coating material and solvent used.
- (b) To document compliance with condition D.4.6, the Permittee shall maintain records of the computer collected data.
- (c) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

The following eleven (11) wire enameling ovens with add on thermal incinerators for control:

- (1) Five (5) wire enameling ovens with add on thermal incinerators for control, identified as emission units 53, 54, 55, 56 and 57, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the west incinerator identified as SWI.
- (2) Three (3) wire enameling ovens with add on thermal incinerators for control, identified as emission units 58, 59 and 60, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
- (3) Two (2) wire enameling ovens with add on thermal incinerators for control, identified as emission units 61 and 62, with a maximum capacity of 156.49 pounds of aluminum wire per hour each or a maximum capacity of 398.75 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
- (4) One (1) wire enameling oven with add on thermal incinerator for control, identified as emission unit 63, with a maximum capacity of 144.72 pounds of copper wire per hour or a maximum capacity of 127.14 pounds of aluminum wire per hour. Emissions shall be exhausted at the east incinerator identified as SEI.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC)

- (a) The eleven (11) wire enameling ovens, emission units 53 through 63, were constructed prior to 1980, therefore, there are no applicable VOC requirements for these emission units.
- (b) Any change or modification which may increase potential emissions from the eleven (11) wire enameling ovens, emission units 53 through 63, shall require prior approval from the OAM before such change may occur.

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C- Performance Testing.

SECTION D.6

FACILITY CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

Two (2) wire enameling ovens with an integral internal thermal oxidizer, identified as emission units 65 and 66, with a maximum capacity of 891 pounds of copper/aluminum wire per hour each.

Emissions shall be exhausted at stacks S65 and S66, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), the volatile organic compound (VOC) content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall be limited to 1.7 pounds VOC per gallon of coating less water delivered to the applicator.
- (b) The limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.6.3 Volatile Organic Compounds (VOC)

- (a) The integral internal thermal oxidizers associated with ovens 65 and 66 shall operate with an overall efficiency of not less than 94.10% at all times when the wire enameling ovens are in operation.
- (b) The 94.10% overall efficiency is necessary to ensure compliance with 326 IAC 8-2-8.
- (c) The integral internal thermal oxidizers shall be operated at or above 1380EF or a temperature determined during compliance tests to maintain a minimum 94.10% overall efficiency.
- (d) The worst case coating VOC content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall not exceed 6.46 pounds VOC per gallon of coating less water. This is equivalent to a VOC content of 1.7 pounds VOC per gallon of coating less water after the effect of the integral internal thermal oxidizer.

D.6.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (b) Additionally, if a higher VOC content coating is used or if the temperature falls below the 1380EF required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner to ensure compliance with the 94.10% overall efficiency.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.6 Monitoring

- (a) Compliance with the 1380EF minimum temperature will be monitored by computer collected data generated continuously.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oven shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature.
- (e) If during specific hours the temperature is less than the established minimum temperature, this will be considered noncompliance.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.7 Record Keeping Requirements

- (a) To document compliance with Condition 6.1, the Permittee shall maintain records of material safety data sheets (MSDS) to verify the VOC content of each coating material and solvent used.
- (b) To document compliance with condition D.6.6, the Permittee shall maintain records of the computer collected data.
- (c) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

SECTION D.7

FACILITY OPERATION CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

Three (3) wire coating ovens, identified as emission units 24, 25 and 26 with a maximum capacity of 272 pounds per hour each. Emissions shall be exhausted at stack SF-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds

- (a) The actual VOC emissions from emission units 24, 25 and 26 are less than 15 pounds per day each. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification which may increase the actual emissions to 15 pounds per day or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.
- (b) This limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

Compliance Determination Requirements

D.7.2 Volatile Organic Compound (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.7.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.7.3 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C- Performance Testing.

Record Keeping and Reporting [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.7.1.
 - (1) The amount and VOC content of each coating material used. Records shall include material safety data sheets (MSDS), product specification sheets, and coating inputs necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each day any coating material containing VOCs is applied.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.8

FACILITY OPERATION CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

Three (3) wire coating ovens, identified as emission units 35, 36 and 37 with a maximum capacity of 172.39 pounds per hour each. Emissions shall be exhausted at stack SF-2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compounds

- (a) Potential emissions from emission units 35, 36 and 37 are less than 15 pounds per day each. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification which may increase the potential emissions to 15 pounds per day or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.
- (b) This limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

Compliance Determination Requirements

D.8.2 Volatile Organic Compound (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.8.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.8.3 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C- Performance Testing.

Record Keeping and Reporting [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.4 Record Keeping Requirements

- (a) To document compliance with Condition D.8.1, the Permittee shall maintain records of material safety data sheets (MSDS) to verify the VOC content of each coating material and solvent used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.9

FACILITY OPERATION CONDITIONS

Wire Coating Plant

Facility Description [326 IAC 2-7-5(15)]

Degreasing operation with a maximum usage of 2533 pounds per year of hydrocarbon.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for a least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirement

D.9.2 Testing Requirement [326 IAC 2-7-6(1)(6)] [326 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C- Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Superior-Essex
Source Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Mailing Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Part 70 Permit No.: T003-7654-00269

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Superior-Essex
Source Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Mailing Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Part 70 Permit No.: T003-7654-00269

This form consists of 2 pages

Page 1 of 2

| | |
|----------------------------|--|
| Check either No. 1 or No.2 | |
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Superior-Essex
Source Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Mailing Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Part 70 Permit No.: T003-7654-00269

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

| | | |
|--|--|--|
| | | |
| | | |
| | | |
| | | |

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Superior-Essex
Source Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Mailing Address: 1601 Wall Street, Ft. Wayne, Indiana 46802
Part 70 Permit No.: T003-7654-00269

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Compliance Monitoring Requirement (e.g. Permit Condition D.1.3) | Number of Deviations | Date of each Deviation |
|---|-----------------------------|-------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Superior-Essex
Source Location: Chemical Processing Plant: 1700 W. Swinney, Fort Wayne, IN 46802
Wire Coating Plant: 1601 Wall St., Ft. Wayne, IN 46802
County: Allen
SIC Code: Chemical Processing Plant: 2851
Wire Coating Plant: 3357
Operation Permit No.: T003-7654-00269
Permit Reviewer: Karen Purtell

On May 18, 1999, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, in Fort Wayne, Indiana, stating that Essex Group, Inc., now operating as Superior - Essex, had applied for a Part 70 Operating Permit to operate a magnet wire coating process. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 17, 1999, Superior-Essex, submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Please note that the official name of the firm was recently changed to "Superior-Essex" from "Essex Group, Inc.". Please make this change throughout the entirety of the document.

Response to Comment 1:

The OAM has made the above mentioned change throughout the body of the operating permit. However, the OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring these types of concerns are documented and part of the record regarding this permit decision

Comment 2:

Magnet wire oven number 64 was removed in the interim period between Title V application and the issuance of this draft Title V permit. Please make the appropriate changes throughout the document where there is reference to oven #64 (ex. pages 4, 7, and 37 of the body of the operating permit and Technical Support Document pages 2, 7 and 10.)

Response to Comment 2:

The above mention change has been made throughout the body of the operating permit. However, the OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring these types of concerns are documented and part of the record regarding this permit decision.

Comment 3:

Condition B.10 (Certification). Superior-Essex would like the permit to allow for the responsible official to delegate his/her certification authority to employee(s) more in contact with the day-to-day operations of the plants.

Response to Comment 3:

326 IAC 2-7-4(f), 326 IAC 2-7-6(1) and 326 IAC 2-7-5(3)(C) specifically state that the responsible official must certify compliance. However, under the provisions of 326 IAC 2-7-1(34)(vi)(BB), Superior-Essex may submit the name and title of the person they want delegated as the "responsible" official for approval by OAM. Additionally, the following changes have been made to the condition: (deleted language appears as ~~strikeouts~~, new language is **Bolded**)

B.10 Certification **[326 IAC 2-7-5(3)(C)]** [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

Comment 4:

Condition B.14 (Permit Shield). The newly issued Title V air permit should be designated as "the sole document for determining compliance with applicable requirements established by previously issued permits, thus superceding those previously issued permits."

Response to Comment 4:

On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However, the OAM also believes that the Permit Shield condition B.14(a)(1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with the applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review.

The following language has been added to Condition B.14(d):

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information refers to information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

Comment 5:

Condition C.14 (Risk Management Plan) It was originally expected that Risk Management Planning would be applicable at Superior-Essex' Ft. Wayne operations due to storage of propane. However, Superior-Essex is now awaiting resolution to recent activity both in the courts and at the EPA to determine if RMP will apply at Superior-Essex's Ft. Wayne operations.

Response to Comment 5:

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The plan must be submitted if the Permittee may meet the threshold at some time in the future. If the courts and EPA decide that a RMP is not required for this operation then the Permittee will not be required to submit a RMP. There has been no change in the condition as a result of this comment.

Comment 6:

Condition C.20 (General Reporting Requirements) Throughout the text of the draft permit, IDEM generally allows 90 days after final permit issuance for preparation of various required 'operating plans' (plus potential for an additional 90 days, if such an extension is approved by IDEM). Superior-Essex is thankful for this implementation period and wants IDEM to be aware of potential for data gaps, etc in the permit's initial reporting period while these operating plans are being implemented.

Response to Comment 6:

Compliance monitoring is one of the main goals of the Title V permit program. If a Permittee is unable to begin monitoring within the initial time period, notification with a full justification of the reasons for the inability to meet the deadline should be accompanied by a Responsible Official Certification.

Comment 7:

Condition D.1.3 plus similar spots throughout the permit (Testing Requirements). While IDEM wishes to express its interest in reserving the opportunity to require stack testing for compliance demonstration, Superior-Essex wishes to express its desire to avoid stack testing as much as possible. Superior-Essex' reasons for stack test avoidance are not only economic but technical as well: the degree of error inherent in stack testing suggest that all other options for compliance determination should first be exhausted before resorting to stack testing.

Response to Comment 7:

Testing is not specifically required by this permit, however 326 IAC 2-7-6(1), (6) and 326 IAC 2-7-7(a) gives IDEM the authority to require testing as part of the Title V permit. If IDEM has reason to suspect a source is out of compliance with a permit limit, a stack test may be required IDEM is aware of the cost and time involved in a stack test and will use other means to prove compliance if possible.

Comment 8:

Condition D.2.7 (Record Keeping Requirements). If Superior-Essex correctly understands IDEM compliance philosophy for this emission units (calculations of actual SO₂ emissions or certification of fuel oil sulfur content), then recordkeeping requirements for compliance demonstration for SO₂ emissions should be written as an option between D.2.7(a)(2) **or** D.2.7(a)(3). In summary, the word "or" should be added at the end of the text of D.2.7(a)(2).

Response to Comment 8:

40 CFR 60.48c(g) states that the owner or operator of each affected facility shall record **and** maintain records of the amounts of each fuel combusted during each day. Therefore, the word "or" will not be added at the end of the text of D.2.7(a)(2).

Comment 9:

Condition D.4 (Oven number 52). Target temperature for oven #52's integral thermal oxidizer should be listed as 1380 degrees Fahrenheit. Oven #52 is considered to be functionally equivalent to oven #65, which was stack tested as compliant (in fact, > 99.9% destruction efficiency) at 1380 F. (Note: Superior-Essex must acknowledge that its letter responding to the "unofficial" pre-public notice Title V draft was in error when referencing a target temperature of 1170 F. In point of fact, 1170 F was listed in the final stack test report as the stack gas temperature, while the incinerator temperature was referenced in the report as 1380 F. Thus, 1380 F should be the target temperature in the Title V permit for oven #52. The stack test in question was conducted in November 1997 as per Registration NO. CP 003-8192; the test was observed by Mr. Steve Friend of IDEM, and results were submitted to Mr. Ed Surla of IDEM.) Finally, while Superior-Essex agrees with eliminating careless evaporation of solvents, it has been observed that the definition of "covered" re: containers of coatings and solvents is often not interpreted uniformly within IDEM.

Response to Comment 9:

Jennifer Schick, the OAM inspector for Superior-Essex, evaluated the integral thermal oxidizer for oven #52 and noted it was operating at 1400 degrees Fahrenheit during OAM's recent inspection. It was also noted that the Title V application lists the minimum operation temperature at 1400 degrees Fahrenheit. Steve Friend concurs that the OAM does not have sufficient information to show that oven 52 and 65 are in fact identical ovens. Additionally, the ovens have different maximum throughput capabilities and use different coatings. Steve Friend stated that since the maximum throughput and coating usage are different the OAM can not assume the same minimum control efficiency on the thermal oxidizers. Therefore, the required minimum temperature of the integral thermal oxidizer on oven #52 shall be listed at 1400 degrees. The OAM believes the language regarding the covered containers is clear. It is necessary to keep coating and solvent containers covered at all times to prevent evaporation.

Comment 10:

Section D.6 (Ovens 65 and 66). Target temperature for integral thermal oxidizer of ovens #s 65 and 66 should be listed as 1380 degrees Fahrenheit. Oven #65 was stack tested as compliant (in fact, 99.9% destruction efficiency) at 1380 F. (Note: Superior-Essex must acknowledge that its letter responding to the "unofficial" pre-public notice Title V draft was in error when referencing a target temperature of 1170 F. In point of fact, 1170 F was listed in the final stack test report as the stack gas temperature, while the incinerator temperature was referenced in the report as 1380 F. Thus, 1380 F should be the target temperature in the Title V permit for oven 65 and 66. The stack test in question was conducted in November 1997 as per Registration No. CP 003-8192; the test was observed by Steve Friend of IDEM, and results were submitted to Mr. Ed Surla of IDEM.) Finally, while Superior-Essex agrees with eliminating careless evaporation of solvents, it has been observed that the definition of "covered" re: containers of coatings and solvents is often not interpreted uniformly within IDEM.

Response to Comment 10:

The target temperature for the integral thermal oxidizer of oven #s 65 and 66 have been changed to 1380 degrees Fahrenheit per the stack test conducted in November 1997. The OAM

believes the language regarding the covered containers is clear. It is necessary to keep coating and solvent containers covered at all times to prevent evaporation.

Comment 11:

Section D.7.4 (Record Keeping and Reporting). This refers to “records maintained for (1) through (6).....” Note, however, that there are only three bullets in this section.

Response to Comment 11:

Section D.7.4 has been changed from “(1) through (6)...” to “(1) through (3)...”.

Comment 12:

Section D.9 (Degreasing Operation). During the pre-public notice comment period, Superior-Essex questioned why some emissions units defined as insignificant by IDEM’s own Title V permitting instructions must be listed in the body of the permit (and some with more trivial compliance demonstration requirements besides). IDEM responded that these emission units were subject to applicable rules and thus must be in the body of the permit. Superior-Essex chooses to raise this issue again in response to the Cold Cleaner entry of the Title V permit because installation of another cold cleaner is being contemplated. While plans are not yet firm, calculations indicate that this proposed units has potential to emit that qualifies as exempt from construction permitting. Superior - Essex understands that such an emission unit may indeed be installed without a construction permit, but IDEM must be notified in order to have the emissions units added to the existing Title V permit.

Response to Comment 12:

The OAM does not know what the potential to emit for the new degreasing operation will be, therefore, Superior-Essex must adhere to the requirements under 326 IAC 2-7-10.5, 326 IAC 2-7-11 and 326 IAC 2-7-12. An emission unit can be considered insignificant and still have applicable rules. If the rule does not have a minimum emissions threshold listed in the applicability of the rule the emission unit is subject to the rule, regardless of the emissions. If the emission unit has an applicable rule then it must have a D section for compliance determination.

Upon further review, the OAM has decided to make the following changes to the permit:

1. The compliance monitoring report required in Condition C.20 (General Reporting Requirements) and Condition D.2.8 (Reporting Requirements) has been changed from semi-annual to quarterly pursuant to 40 CFR 60.48c(d).
2. The word “each” has been added to the first sentence of Condition D.7.1(a). Condition D.7.4(a)(3) has been changed as follows to be consistent with the record keeping requirements necessary to ensure 326 IAC 8-2-8 does not apply.

D.7.1 Volatile Organic Compounds

- (a) The actual VOC emissions from emission units 24, 25 and 26 are less than 15 pounds per day **each**. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification which may increase the actual emissions to 15 pounds per day or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.

D.7.4 Record Keeping Requirements

- (3) The total VOC usage for each ~~month~~ **day**.

3. The PTE listed in Condition D.8.1(a) has been changed as follows to accurately represent the PTE of these units.

D.8.1 Volatile Organic Compounds

- (a) Potential emissions from emission units 35, 36 and 37 are less than ~~25 tons~~ **15 pounds** per ~~year~~ **day** each. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification

which may increase the potential emissions to ~~25 tons~~ **15 pounds** per year ~~day~~ or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.

On August 18, 1999, the following additional comments were received from Superior-Essex on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Superior Essex noted that in permit section D.3, all the ASTs at the Chem Processing plant were referenced as having been constructed/modified after July 23, 1984. In fact, only ASTs 17 through 23 plus ASTs 3 and 25 were constructed after July 1984. Also, only ASTs 17 through 23 are greater than 40 cubic meters in volume and all ASTs are known to be less than 7 cubic meters in volume. NSPS 40 CFR subpart K and subpart Ka are believed to be not applicable at Chem Processing since petroleum liquids are not stored in the ASTs. Also, there is no AST at Chem Processing at level of regulation applicability (40,000 gallons). Thus, it appears that there are no compliance demonstration requirements for ASTs constructed prior to July 1984.

Response to Comment 1:

Based on a review of the documentation in the Title V application for the ASTs at Superior Essex's Chem Processing plant, the following change was made to the operating permit:

D.3.1 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels)

- (a) Storage tanks ~~1 through 8, 10 through 24 and 25 through 30~~ **17 through 23** are subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of each tank is greater than 40 m³ that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.
- (b) The tanks are exempt from the General Provisions (Part 60, subpart A) and from the provisions of this subpart because the tanks have a capacity ~~greater~~ **less** than or equal to ~~151 75 m3, storing liquid with a maximum true vapor pressure less than 3.5 kPa.~~
- (c) ~~Pursuant to 40 CFR Part 60, Subpart Kb, the Permittee shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. (Available data on the storage temperature may be used to determine the maximum vapor pressure as determined in 40 CFR Part 60.117b(e)(1)-(3)).~~

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

~~To document compliance with Condition D.3.1, the Permittee shall:~~

-
- ~~(1) maintain the records of the volatile organic liquid (VOL) stored;~~
- ~~(2) the period of storage;~~
- ~~(3) the maximum true vapor pressure of the volatile organic liquid (VOL) during the respective storage period;~~
- ~~(4) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.~~

To document compliance with Condition D.3.1, the Permittee shall keep readily accessible records showing the dimension of the storage tanks and an analysis showing the capacity of the storage tanks.

Comment 2:

Superior Essex is disappointed that IDEM is unwilling to recognize minimum incinerator temperature for magnet wire oven #52 as 1380 F rather than 1400 F based on stack test data from functionally identical oven #65.

Response to Comment 2:

See Response to Comment 9 of Superior Essex's letter of June 17, 1999. As stated in this earlier comment, IDEM is without sufficient evidence showing that oven #52 and #65 are functionally identical.

Comment 3:

Superior Essex is disappointed that IDEM is reverting back to demanding quarterly compliance monitoring reports.

Response to Comment 2:

See additional changes made upon review by IDEM. "The compliance monitoring report required in Condition C.20 (General Reporting Requirements) and Condition D.2.8 (Reporting Requirements) has been changed from semi-annual to quarterly pursuant to 40 CFR 60.48c(d)"

Comment 3:

Superior Essex is disappointed that IDEM is seeking daily VOC usage at fabric lines 24, 25 and 26. This is an unpleasant surprise because all Title V drafts up to now have demanded monthly recordkeeping. VOC potential to emit exceeds 15 lbs/day at fabric lines 24, 25 and 26 only when one specific end product is in production. Superior Essex proposes that IDEM demand such detailed daily recordkeeping at fabric lines 24, 25 and 26 only on days when this specific end-product is in production at these facilities.

Response to Comment 3:

Upon further review IDEM made the following change to the permit:

D.7.4 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be ~~taken~~ **compiled** monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.7.1.

- (1) The amount and VOC content of each coating material used. Records shall

include ~~purchase orders, invoices, and~~ material safety data sheets (MSDS), **product specification sheets, and coating inputs** necessary to verify the type and amount used;

- (2) A log of the dates of use;
- (3) The total VOC usage for each day **any coating material containing VOCs is applied.**

On September 15, 1999, Superior Essex provided documentation from Weather-Rite Enameling Equipment, the manufacturer of oven #52 and #65 as proof that they are functionally identical ovens. Based on the documentation from the manufacturer, the following change has been made to the operating permit:

D.4.3 Volatile Organic Compounds (VOC)

- (a) The integral internal thermal oxidizer associated with oven 52 shall operate with an overall efficiency of not less than 95.19% at all times when the wire enameling oven is in operation.
- (b) The 95.19% overall efficiency is necessary to ensure compliance with 326 IAC 8-2-8.
- (c) The integral internal thermal oxidizer shall be operated at or above ~~1400~~ **1380**EF or a temperature determined during compliance tests to maintain a minimum 95.19% overall efficiency.
- (d) The worst case coating VOC content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall not exceed 6.46 pounds VOC per gallon of coating less water. This is equivalent to a VOC content of 1.7 pounds VOC per gallon of coating less water after the effect of the integral internal thermal oxidizer.

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (b) Additionally, if a higher VOC content coating is used or if the temperature falls below the ~~1400~~ **1380**EF required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner to ensure compliance with the 95.19% overall efficiency.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

- (a) Compliance with the ~~1400~~ **1380**EF minimum temperature will be monitored by computer collected data generated continuously.

.

.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Essex Group, Inc.
Source Location: Chemical Processing Plant: 1700 West Swinney, Fort Wayne, Indiana 46802
Wire Coating Plant: 1601 Wall Street, Fort Wayne, Indiana 46802
County: Allen
SIC Code: Chemical Processing Plant: 2851
Wire Coating Plant: 3357
Operation Permit No.: T003-7654-00269
Permit Reviewer: Karen Purtell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Essex Group, Inc. relating to the operation of wire coating and chemical processing.

Source Definition

This wire coating company consists of two (2) plants:

- (a) Chemical Processing Plant is located at 1700 West Swinney, Fort Wayne, Indiana 46802; and
- (b) Wire Coating Plant is located at Plant: 1601 Wall Street, Fort Wayne, Indiana 46802.

Since the two (2) plants are located in contiguous properties and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Chemical Processing Plant

- (a) Two (2) 4000 gallon hot oil heated reactors with fume scrubbers, agitator condenser and distillation column identified as emission units R-1 and R-2.
- (b) Seven (7) jacketed mix kettles identified as follows:

- (1) Two (2) 2000 gallon jacketed mix kettles equipped with agitator and condenser, identified as emission units K-1 and K-2.
 - (2) One (1) 1000 gallon jacketed mix kettle equipped with agitator and condenser, identified as K-3.
 - (3) One (1) 4000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-4.
 - (4) One (1) 5000 gallon jacketed mix kettle equipped with an agitator and a condenser, identified as emission unit K-5.
 - (5) Two (2) 10000 gallon jacketed kettles each equipped with an agitator and a condenser, identified as emission units K-6 and K-7.
- (c) Two 16.74 MMBtu per hour boilers, identified as follows:
- (1) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit EB and exhausting to stack ID SCB. This boiler is equipped with a burner to use No. 2 fuel oil in case of an emergency to prevent a total shutdown.
 - (2) One (1) 16.74 MMBtu per hour natural gas fired boiler, identified as emission unit WB and exhausting to stack ID SCB.

Wire Coating Plant

- (a) One (1) wire enameling oven with an integral internal thermal oxidizer, identified as emission unit number 52, with a maximum capacity of 531 pounds per hour. Emissions shall be exhausted at stack S52.
- (b) The following twelve (12) wire enameling ovens with add on thermal incinerators for control:
 - (1) Five (5) wire enameling ovens with add on thermal incinerators for control, identified as emission units 53, 54, 55, 56 and 57, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the west incinerator identified as SWI.
 - (2) Three (3) wire enameling ovens with add on thermal incinerators for control, identified as emission units 58, 59 and 60, with a maximum capacity of 157.63 pounds of aluminum wire per hour each or a maximum capacity of 399.2 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
 - (3) Two (2) wire enameling ovens with add on thermal incinerators for control, identified as emission units 61 and 62, with a maximum capacity of 156.49 pounds of aluminum wire per hour each or a maximum capacity of 398.75 pounds of copper wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
 - (4) Two (2) wire enameling ovens with add on thermal incinerators for control,

- identified as emission units 63 and 64, with a maximum capacity of 144.72 pounds of copper wire per hour each or a maximum capacity of 127.14 pounds of aluminum wire per hour each. Emissions shall be exhausted at the east incinerator identified as SEI.
- (c) Two (2) wire enameling ovens with an integral internal thermal oxidizer, identified as emission units 65 and 66, with a maximum capacity of 891 pounds of copper/aluminum wire per hour each. Emissions shall be exhausted at stacks S65 and S66, respectively.
 - (d) Three (3) wire coating ovens, identified as emission units 24, 25 and 26, with a maximum capacity of 272 pounds per hour each. Emissions shall be exhausted at stack SF-1.
 - (e) Three (3) wire coating ovens, identified as emission units 35, 36 and 37, with a maximum capacity of 172.39 pounds per hour each. Emissions shall be exhausted at stack SF-2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

Chemical Processing Plant

- (a) The following storage tanks emitting less than 15 pounds per day of VOC:
 - (1) outside storage tanks 1 through 8 and 10 through 24
 - (2) inside storage tanks 25 through 30
- (b) Natural gas fired combustion sources with heat input equal to or less than ten million Btu per hour.
- (c) Propane or liquified petroleum gas, or butane fired combustion sources with heat input equal to or less than six million Btu per hour.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) Closed loop heating and cooling systems.
- (g) heat exchanger cleaning and repair.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (i) Blowdown for any of the following: slight glass; boiler, compressors, pumps, and cooling towers.

- (j) On-site fire and emergency response training approved by the department.
- (k) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Wire Coating Plant

- (a) Degreasing operation with a maximum usage of 2533 pounds per year of hydrocarbon.
- (b) Natural gas fired combustion sources with heat input equal to or less than ten million Btu per hour.
- (c) Propane or liquified petroleum gas, or butane fired combustion sources with heat input equal to or less than six million Btu per hour.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Filling drums, pails, or other packaging containers with lubricating oils, waxes and greases.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (g) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (h) Quenching operations used with heat treating processes.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Process vessel degassing and cleaning to prepare for internal repairs.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Asbestos abatement projects regulated by 326 IAC 14-10.
- (n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (o) Equipment used to collect any material that might be released during a malfunction, process upset or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.

- (r) Stationary fire pumps.
- (s) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Chemical Processing Plant

- (a) 02-02-81-0526 and 02-02-81-0527, issued prior to 1980; and
- (b) R003-3440-00108 issued on March 25, 1994.

Wire Coating Plant:

- (a) OP02-04-88-0631, issued October 2, 1984;
- (b) Exemption 003-4841-00077, issued November 22, 1995; and
- (c) Exemption 003-5823-00077, issued May 21, 1996

All conditions from previous approvals were incorporated into this Part 70 permit.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the VOC internal thermal oxidizers be considered as an integral part of the wire coating process:

The VOCs will be oxidized using only the process heat supplied by the curing ovens.

IDEM, OAM has evaluated the justifications and agreed that the thermal oxidation systems will be considered as an integral part of the wire coating process. Therefore, the permitting level will be determined using the potential to emit after the internal thermal VOC oxidation system. Operating conditions in the proposed permit will specify that this thermal VOC oxidation system shall operate at all times when the wire coating process is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was

received on December 13, 1996. Additional information was received on March 30, 1999.

A notice of completeness letter was mailed to the source on January 8, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 4.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | less than 100 |
| PM-10 | less than 100 |
| SO ₂ | less than 100 |
| VOC | greater than 250 |
| CO | less than 100 |
| NO _x | less than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential To Emit (tons/year) |
|--------------|-------------------------------|
| Xylene | greater than 10 |
| Methanol | greater than 10 |
| M-Cresol | less than 10 |
| glycol ether | greater than 10 |
| TOTAL | greater than 25 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 0.00 |
| PM-10 | 0.48 |
| SO ₂ | 0.04 |
| VOC | 113.44 |
| CO | 1.92 |
| NO _x | 0.00 |
| m-Cresol | 4.11 |
| Xylene | 13.71 |
| Methanol | 7.83 |
| Glycol Ether | 7.08 |

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

| | Limited Potential to Emit (tons/year) | | | | | | |
|--------------------|--|-------|-----------------|------------------|----|-----------------|------|
| Process/facility | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Reactors & Kettles | | | | less than 25 | | | |
| Oven 52 | | | | 6.24 | | | |
| Ovens 53-64 | | | | greater than 250 | | | |
| Ovens 65 & 66 | | | | 6.15 each | | | |
| Ovens 24, 25 & 26 | | | | less than 2.7* | | | |
| Ovens 35, 36 & 37 | | | | less than 2.7* | | | |
| Total Emissions | | | | greater than 250 | | | |

* Ovens 24, 25, 26 35, 36 and 37 are limited to less than 15 pounds per day actuals.

County Attainment Status

The source is located in Allen County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels):
Storage tanks 17 through 23 are subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of each tank is greater than 40 m³ that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.

The tanks are exempt from the General Provisions (Part 60, subpart A) and from the provisions of this subpart because the tanks have a capacity less than or equal to 75 m³.

Pursuant to 40 CFR Part 60, Subpart Kb, the Permittee shall keep readily accessible records showing the dimension of the storage tanks and an analysis showing the capacity of the storage tanks.

- (b) 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units):

The 16.74 MMBtu per hour oil-fueled boiler is subject to 40 CFR 60, Subpart 60 Dc, because it was constructed in 1994.

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall:

- (1) emissions shall not exceed five tenths (0.5) pounds per MMBtu heat input; or
- (2) sulfur content of the fuel oil shall not exceed five tenths percent (0.5%) by weight.

The Permittee shall demonstrate compliance utilizing one of the following options:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (a) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (b) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR subpart 63) applicable to this source. 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) does not apply to the degreasing operation because no HAPs are used in the degreasing operation.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21, this source is a major source. The source did not go through PSD review because most of the wire coating ovens were constructed prior to August of 1977. The wire coating ovens that have been constructed after August of 1977 do not have potential emissions greater than 40 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Reactors and Kettles

326 IAC 8 (Volatile Organic Compounds)

Any change or modification which may increase VOC potential emissions above 25 tons per year, from the 4000 gallon hot oil heated reactor, identified as emission units R-1, R-2, or the Five (5) jacketed mix kettles identified as K-1, K-2, K-3, K-4 and K-6, shall require prior approval

from the OAM to determine applicability requirements, before such change may occur.

State Rule Applicability - Two (2) 16.74 MMBtu per hour boilers

326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating)

Particulate emissions from the one (1) 16.74 MMBtu per hour natural gas fired boiler and the one (1) 16.74 MMBtu per hour natural gas fired boiler with No. 2 fuel oil backup, shall be limited to 0.437 pounds PM per MMBtu heat input based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = pounds of particulate matter emitted per MMBtu heat input.

Q = Total source maximum operating capacity rating in MMBtu per hour.

326 IAC 7-1.1 and 325 IAC 7-4 (Sulfur Dioxide Emission Limitations)

The 16.74 MMBtu per hour fuel oil boiler is not subject to this rule because the potential to emit does not exceed twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

State Rule Applicability - Oven 52

326 IAC 8-2-8 (Magnet Wire Coating Operations)

- (a) The volatile organic compound (VOC) content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall be limited to 1.7 pounds VOC per gallon of coating less water delivered to the applicator.
- (b) The limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

Based on calculations (appendix) A, the source is in compliance with this rule.

The integral internal thermal oxidizer associated with oven 52 shall operate with an overall efficiency of not less than 95.19% at all times when the wire enameling oven is in operation. The 95.19% overall efficiency is necessary to ensure compliance with 326 IAC 8-2-8.

State Rule Applicability - Ovens 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63 and 64

These ovens were constructed prior to 1980, therefore, there are no applicable requirements for these facilities other than those listed in Section B and C of the Title V permit.

State Rule Applicability - 65 and 66

326 IAC 8-2-8 (Magnet Wire Coating Operations)

- (a) The volatile organic compound (VOC) content of electrically insulating varnishes or enamel applied to aluminum or copper wire for use in electrical machinery shall be limited to 1.7 pounds VOC per gallon of coating less water delivered to the applicator.
- (b) The limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to

prevent solvent evaporation.

Based on calculations (appendix) A, the source is in compliance with this rule.

The integral internal thermal oxidizer associated with ovens 65 and 66 shall operate with an overall efficiency of not less than 94.10% at all times when the wire enameling ovens are in operation. The 94.10% overall efficiency is necessary to ensure compliance with 326 IAC 8-2-8.

State Rule Applicability - Ovens 24, 25 and 26

326 IAC 8 (Volatile Organic Compounds)

- (a) The actual VOC emissions from emission units 24, 25 and 26 are less than 15 pounds per day. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification which may increase the actual emissions to 15 pounds per day or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.
- (b) This limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

The potential emissions from these ovens is greater than 15 pounds per day, therefore the source must do record keeping to show that actual VOC emissions are less than 15 pounds per day.

State Rule Applicability - Oven 35, 36 and 37

326 IAC 8 (Volatile Organic Compounds)

- (a) Potential emissions from emission units 35, 36 and 37 are less than 15 pounds per day. Therefore, 326 IAC 8-2-8 will not apply. Any change or modification which may increase the potential emissions to 15 pounds per day or more of volatile organic compounds must be approved by the office of Air Management before any such change may occur.
- (b) This limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

State Rule Applicability - Degreasing Operation

326 IAC 8-3-2 (Cold Cleaner Operations)

The owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for a least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate

compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Oven 52, 65 and 66 have applicable compliance monitoring conditions as specified below:

Compliance with the minimum temperature will be monitored by computer collected data generated continuously. Eight-hour average temperatures will be made available to IDEM upon request and one-hour temperature records will be made available within five business days from request. The temperatures will be reported based on an eight-hour average. The ovens shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If during specific hours the temperature is less than the established minimum temperature, this will be considered noncompliance.

2. The 16.74 MMBtu per hour fuel oil boiler has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when fuel oil is being burned and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this chemical processing and wire coating plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T003-7654-00269.

Appendix A: Emissions Calculations
VOC and Particulate
From Wire Coating Operations not subject to 326 IAC 8-2-8

Page 1 of 4 TSD App A

Company Name: Essex Group, Inc.
Address City IN Zip: 1601 Wall Street, Ft. Wayne, Indiana 46802
CP: T003-7654
Plt ID: 003-00269
Reviewer: Karen Purtell
Date: March 11, 1999

| Material | Density (Lb/Gal) | Weight % Volatile (H2O& Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential ton/yr | lb VOC /gal solids | Transfer Efficiency | (NOT INTEGRAL) control efficiency % | Potential VOC after control tons per year |
|----------------------|---------------------|--|-------------------|----------------------|-------------------|---------------------------------|--------------------------|------------------------|--|--|-------------------------------------|------------------------------------|-----------------------------------|------------------------------------|--------------------------|------------------------|---|---|
| Oven 53 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 54 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 55 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 56 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 57 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 58 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 59 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 60 (worst case) | 8.72 | 87.20% | 0.174% | 87.0% | 0.182% | 7.62% | 0.10200 | 157.630 | 7.60 | 7.59 | 122.01 | 2928.30 | 534.42 | 0.00 | 99.59 | 100% | 95.00% | 26.72 |
| Oven 61 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 14.02% | 0.10800 | 156.490 | 6.46 | 6.45 | 108.96 | 2614.98 | 477.23 | 0.00 | 45.98 | 100% | 95.00% | 23.86 |
| Oven 62 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 14.02% | 0.10800 | 156.490 | 6.46 | 6.45 | 108.96 | 2614.98 | 477.23 | 0.00 | 45.98 | 100% | 95.00% | 23.86 |
| Oven 63 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 14.02% | 0.10100 | 144.720 | 6.46 | 6.45 | 94.23 | 2261.56 | 412.73 | 0.00 | 45.98 | 100% | 95.00% | 20.64 |
| Oven 64 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 14.02% | 0.10100 | 144.720 | 6.46 | 6.45 | 94.23 | 2261.56 | 412.73 | 0.00 | 45.98 | 100% | 95.00% | 20.64 |
| Oven 35 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00064 | 172.390 | 5.16 | 5.15 | 0.57 | 13.64 | 2.49 | 0.00 | 37.01 | 100% | 0.00% | 2.49 |
| Oven 36 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00064 | 172.390 | 5.16 | 5.15 | 0.57 | 13.64 | 2.49 | 0.00 | 37.01 | 100% | 0.00% | 2.49 |
| Oven 37 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00064 | 172.390 | 5.16 | 5.15 | 0.57 | 13.64 | 2.49 | 0.00 | 37.01 | 100% | 0.00% | 2.49 |
| Oven 24 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00047 | 272.000 | 5.16 | 5.15 | 0.66 | 15.81 | 2.88 | 0.00 | 37.01 | 100% | 0.00% | 2.88 |
| Oven 25 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00047 | 272.000 | 5.16 | 5.15 | 0.66 | 15.81 | 2.88 | 0.00 | 37.01 | 100% | 0.00% | 2.88 |
| Oven 26 | 8.20 | 63.00% | 0.174% | 62.8% | 0.171% | 13.92% | 0.00047 | 272.000 | 5.16 | 5.15 | 0.66 | 15.81 | 2.88 | 0.00 | 37.01 | 100% | 0.00% | 2.88 |

Total Emissions

318.89

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
VOC and Particulate
From Wire Coating Operations subject to 326 IAC 8-2-8**

Page 2 of 4 TSD App A

Company Name: Essex Group, Inc.
Address City IN Zip: 1601 Wall Street, Ft. Wayne, Indiana 46802
CP: T003-7654
Plt ID: T003-00269
Reviewer: Karen Purtell
Date: March 9, 1999

| Material | Density (Lb/Gal) | Weight % Volatile (H2O& Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential ton/yr | Lb VOC /gal Solids | Transfer Efficiency | integral control required efficiency to comply with 8-2-8 | Potential VOC after integral control pounds per day | Potential VOC after integral control tons per year |
|-------------------------------|---------------------|---|-------------------|----------------------|-------------------|---------------------------------|--------------------------|------------------------|---|--|-------------------------------------|------------------------------------|-----------------------------------|------------------------------------|-----------------------|------------------------|---|---|--|
| Oven 52 (worst case 1st coat) | 8.25 | 78.30% | 0.156% | 78.1% | 0.155% | 14.02% | 0.00459 | 531.00 | 6.46 | 6.45 | 15.72 | 377.19 | 68.84 | 0.00 | 45.98 | 100% | 95.19% | 18.13 | 3.31 |
| Oven 52 (Lube) | 5.90 | 98.00% | 0.196% | 97.8% | 0.140% | 1.72% | 0.00017 | 531.00 | 5.78 | 5.77 | 0.52 | 12.43 | 2.27 | 0.00 | 335.49 | 100% | 0.00% | 12.43 | 2.27 |
| Oven 52 (cleaning) | 7.71 | 100.00% | 0.200% | 99.8% | 0.185% | 0.00% | 0.00004 | 531.00 | 7.71 | 7.69 | 0.15 | 3.63 | 0.66 | 0.00 | ERR | 100% | 0.00% | 3.63 | 0.66 |
| Oven 65 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 17.22% | 0.00371 | 891.00 | 6.46 | 6.45 | 21.31 | 511.45 | 93.34 | 0.00 | 37.44 | 100% | 94.10% | 30.19 | 5.51 |
| Oven 65 (solvent) | 8.17 | 100.00% | 0.200% | 99.8% | 0.196% | 0.00% | 0.00005 | 356.00 | 8.17 | 8.15 | 0.15 | 3.48 | 0.64 | 0.00 | ERR | 100% | 0.00% | 3.48 | 0.64 |
| Oven 66 (worst case) | 8.25 | 78.30% | 0.157% | 78.1% | 0.155% | 17.22% | 0.00371 | 891.00 | 6.46 | 6.45 | 21.31 | 511.45 | 93.34 | 0.00 | 37.44 | 100% | 94.10% | 30.19 | 5.51 |
| Oven 66 (solvent) | 8.17 | 100.00% | 0.200% | 99.8% | 0.196% | 0.00% | 0.00005 | 356.00 | 8.17 | 8.15 | 0.15 | 3.48 | 0.64 | 0.00 | ERR | 100% | 0.00% | 3.48 | 0.64 |

Total Emissions

101.53

18.54

Methodology

Required efficiency = (lb VOC/gal solids -E)/lb VOC/gal solids * 100

E= (1.7 lb VOC/gal of coating/(1-(1.7 lb VOC/gal of coating/7.36 lb VOC/gal coating solids))) = 2.21 lb VOC/gal of solids

Appendix A: Emissions Calculations

Page 3 of 4 TSD App A

Natural Gas Combustion Only**MM BTU/HR <100****Small Industrial Boiler****Company Name: Essex Group, Inc., Chemical Processing Plant****Address City IN Zip: 1700 Swinney, Ft. Wayne, Indiana 46802****CP: T003-7654****Plt ID: 003-00269****Reviewer: Karen Purtell****Date: March 30, 1999**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

33.5

293.3

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|-----|------|-----|---------------------|-----|------|
| Emission Factor in lb/MMCF | 7.6 | 7.6 | 0.6 | 100.0 *see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 1.1 | 1.1 | 0.1 | 14.7 | 0.8 | 12.3 |

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

gasc99.wk4 9/95

updated 11/98

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil

Page 4 of 4 TSD App A

Company Name: Essex Group, Inc. Chemical Processing Plant
Address, City IN Zip: 1700 W. Swinney, Ft. Wayne, Indiana 46802
CP: T003-7654
Plt ID: 003-00269
Reviewer: Karen Purtell
Date: March 30, 1999

| | | |
|--|------------------------------------|---|
| Heat Input Capacity MMBtu/hr | Potential Throughput kgals/year | S = Weight % Sulfur <div style="border: 1px solid black; padding: 2px; display: inline-block;">0.2</div> |
| <div style="border: 1px solid black; padding: 2px; display: inline-block;">16.74</div> | 1047.445714 | |

| | Pollutant | | | | |
|-------------------------------|-----------|------------------|-----------------|------|-----|
| | PM | SO ₂ | NO _x | VOC | CO |
| Emission Factor in lb/kgal | 3.3 | 28.4 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 1.7 | 14.9 | 10.5 | 0.2 | 2.6 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

PM Emission Factor is Condensable and Filterable PM

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

fo1&2com.wk4 9/95
updated 11/98